UNITED STATES DISTRICT COURT FOR THE DISTRICT NEW JERSEY

CITY OF NEWARK,

Plaintiff,

v.

Case No. 2:25-cv-02225-JKS-LDW

GEO RE-ENTRY GROUP, LLC and ABC CORPS. (A FICTITIOUS COMPANY) 1-100,

Defendant.

NOTICE OF POTENTIAL PARTICIPATION BY THE UNITED STATES

The United States respectfully notifies the Court that it is actively considering whether to file a Statement of Interest in this action pursuant to 28 U.S.C. § 517. That statute authorizes the Attorney General of the United States to send any officer of the Department of Justice to "attend to the interests of the United States in a suit pending in a court of the United States, or in the courts of a State, or to attend to any other interest of the United States." 28 U.S.C. § 517.

The process for deciding whether to file a Statement of Interest involves coordination among multiple government agencies and the approval of the U.S. Department of Justice through the Acting Assistant Attorney General for the Civil Division. The United States expects to complete its deliberations and, should it decide to participate, to submit a Statement of Interest no later than next week.

Dated: April 17, 2025

Respectfully submitted,

YAAKOV M. ROTH Acting Assistant Attorney General Civil Division

DREW C ENSIGN Deputy Assistant Attorney General

ANTHONY P. NICASTRO **Acting Director** Office of Immigration Litigation

/s/ John J. W. Inkeles JOHN J. W. INKELES Chief, Affirmative Litigation Unit United States Department of Justice Civil Division Office of Immigration Litigation General Litigation & Appeals Section P.O. Box 878, Ben Franklin Station Washington, DC 20044 Phone: (202) 532-4309

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is an employee of the United States Department of Justice and is a person of such age and discretion as to be competent to serve papers.

That on April 17, 2025, he electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the attorney(s) of the Parties:

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